

Message

From: Huskey, Angela [Huskey.Angela@epa.gov]
Sent: 4/20/2021 6:48:10 PM
To: Aubee, Catherine [Aubee.Catherine@epa.gov]
CC: Nesci, Kimberly [Nesci.Kimberly@epa.gov]
Subject: RE: PFAS in pesticide containers question

Ok, thanks for letting me know.

From: Aubee, Catherine <Aubee.Catherine@epa.gov>
Sent: Tuesday, April 20, 2021 2:42 PM
To: Huskey, Angela <Huskey.Angela@epa.gov>
Cc: Nesci, Kimberly <Nesci.Kimberly@epa.gov>
Subject: Re: PFAS in pesticide containers question

Hi Angela,

The important thing is that registrants who are seeking to substitute alternative containers for ones that differ from what is registered must submit new storage stability/corrosion characteristics data to support that change to the registration.

I believe we issued a 6(a)(2) reminder to registrants that they are obligated to report any PFAS contaminants/impurities in their product, regardless of source. We are not using the SS/CC data as a means to seek out registrants using a specific container type.

Hope this helps.

Best,
Catherine
Associate Director
OPP Registration Division
US Environmental Protection Agency

On Apr 20, 2021, at 12:29 PM, Nesci, Kimberly <Nesci.Kimberly@epa.gov> wrote:

Do you want to get this one? Pretty sure this doesn't mean what Angela thinks it means.

From: Huskey, Angela <Huskey.Angela@epa.gov>
Sent: Tuesday, April 20, 2021 12:14 PM
To: Nesci, Kimberly <Nesci.Kimberly@epa.gov>
Subject: PFAS in pesticide containers question

Hi Kimberly,

I'm still getting up to speed on the PFAS packaging issues, and I saw this on the website.

11. Do the data requirements for containers require information about fluorination to be submitted if containers are fluorinated?

Yes, EPA's storage and stability/corrosion characteristics data requirements require registrants to provide details on the type of container used to distribute the product commercially, which can include fluorinated High Density Polyethylene (HDPE) containers.

Does this mean that EPA is looking through storage and stability data to determine other pesticide manufacturers that use fluorinated HDPE containers and asking them to either test their products or pull them from the shelves? Or are we waiting for pesticide manufacturers to self-identify or report under 6(a)(2)?

Thanks,
Angela

Angela Huskey (she/her) | US EPA | Office of General Counsel | Pesticides and Toxic Substances Law Office | 1200 Pennsylvania Ave., NW | William Jefferson Clinton Federal Building (WJC), Mail Code 2333A | Washington DC 20460 | phone: (202) 564-2892 (office) | callto:huskey.angela@epa.gov (Teams call)

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